

### Remarks

Claims 1-7, 10-12, 15, 17-23, 26-28, 31 and 47-48 are pending. All pending claims stand rejected under 35 USC §102. Claim 10 has been objected to. Claims 1, 4-6, 10, 17, 20, 21, and 26 have been amended.

**Claim Objections:** The Examiner objected to Claim 10 noting a grammatical error. Claim 10 has been amended to address the Examiner's concerns.

**Claim Rejections – 35 USC §102:** The Examiner rejected Claim 1-7, 10-12, 15, 17-23, 26-28, 31 and 47-48 under §102(e) as being anticipated by Brown (US Pub. No. 2002/0174180). A claim is anticipated only if the cited reference teaches or suggests the combination of elements required by that claim. As explained below, Brown fails to teach or suggest one or more elements required by each of the pending claims. The rejections are, therefore, improper.

Claim 1 is directed to a coordinated push synchronization method and includes the following combination of elements.

1. detecting changes to a local application data store;
2. identifying a record affected by a detected change;
3. pushing the identified record to a remote application data store;
4. ascertaining whether the pushed record, in its current form as affected by the detected change, has already been replicated or deleted in the remote application data store;
5. if not, updating the remote application data store with the pushed record and identifying the pushed record in the remote application data store as a pushed record.

The Examiner contends that Brown paragraphs 80-83 and paragraph 66 teach the fourth and fifth elements listed above. Those and other related paragraphs from Brown are described below to show that the Examiner is mistaken.

Brown is directed to a client server model for synchronizing files. Brown, Title and Abstract. Paragraphs 80-83 describe situations resulting from the comparison of server synchronization data (SSD) with client synchronization data. Brown, para. 79. Server synchronization data contains the server's current server synch index (SSI), Server identifiers (SIDs) of the directories with changes, server identifiers (SIDs) of the child directory and child file items for each changed directory, and server metadata items for any items with file synch indexes (FSIs) greater than the client synch index (CSI) passed in by the client's sync poll call. Brown, paragraphs 71-75. Metadata can include a filename, client and server indexes, and a file synch index. Brown, para. 66. Client synchronization data includes server identifiers (SIDs) of all the server directories that existed for the previous client server index (CSI) and, for each directory server identifier (SID), the set of directory and file server identifiers (SIDs) contained in the directory that existed for the previous client server index (CSI). Brown, paragraphs 76-78.

Brown, paragraph 80 describes a first situation that can arise from a comparison in which a server identifier is in the server synchronization data but not in the client synchronization data. In this situation a new file or directory exists on the server that is not present on the client. Brown, para. 80.

Brown, paragraph 81 describes a second situation that can arise from a comparison in which a server identifier is in the client synchronization data but not in the server synchronization data. In this situation a file or directory has been deleted from the server and not the client. Brown, para. 81.

Brown, paragraph 82 describes a third situation that can arise from a comparison in which a server identifier is present in both the server synchronization data and in the client synchronization data client but in different directories. In this situation a file or directory has been moved from one directory to another on the server. Brown, para.

82.

Brown, paragraph 83 describes a fourth situation that can arise from a comparison in which a server identifier is present in both the server synchronization data and in the client synchronization data client and in the same directory. In this situation a file has not been moved or deleted from the server but may have been renamed. Brown, para. 83.

Contrary to the Examiner's contention, Brown does not teach or suggest ascertaining whether a pushed record, in its current form as affected by the detected change, has already been replicated or deleted in the remote application data store in the manner required by Claim 1. Moreover, Brown fails to teach or suggest updating the remote application data store with the pushed record and identifying the pushed record in the remote application data store as a pushed record if it is ascertained that the pushed record has not been so replicated or deleted.

For at least these reasons, Claim 1 is felt to distinguish over Brown. Claims 2-4 and 47 are thus also felt to distinguish over Brown based on their dependency from Claim 1.

Claim 5 is directed to a coordinated user-initiated synchronization method and includes the following combination of elements:

1. detecting changes to a local application data store;
2. identifying a record affected by a detected change;
3. ascertaining whether the identified record, in its current form as affected by the detected change, was pushed to the local application data store from a remote application data store; and
4. if not, synchronizing the remote application data store with the local application data store.

The Examiner contends that Brown paragraph 40 teaches the third and fourth elements listed above. Paragraph 40 is reproduced as follows:

The synchronization process is initiated by a client SA when it makes a sync poll call to the server, passing it the client sync index (CSI) identifying its current known state of the account. If the SSI value matches the CSI value passed in by the polling client, the client is up to date with the current state of its server account. In that case, the server SFS returns the SSI (having the same value as the CSI) back to the client. Otherwise, the server SFS returns the new higher SSI along with the server metadata information the client needs to transition its account from its current state to the server's current state.

Nothing in paragraph 40 mentions or suggests ascertaining whether a record identified as being affected by a detected change was pushed to a local application data store from a remote application data store in the manner required by Claim 5. Furthermore Brown fails to teach or suggest synchronizing the remote application data store with the local application data store if it is ascertained that the identified record was not pushed.

For at least these reasons, Claim 5 is felt to distinguish over Brown. Claims 6, 7, and 48 are thus also felt to distinguish over Brown based on their dependency from Claim 5.

Claim 10 is directed to a coordinated push and user-initiated synchronization method and includes the following combination of elements.

1. detecting changes to a local application data store;
2. identifying a first record in the local application data store affected by a detected change;
3. pushing the first record to a remote application data store;
4. ascertaining whether the pushed record, in its current form as affected by the detected change, has already been replicated in or deleted from the remote application data store and, if not, updating the remote application data store with the pushed record;
5. detecting changes to the remote application data store;
6. identifying a second record in the remote application data store affected by a detected change;
7. ascertaining whether the second record, in its current form as affected by the detected change, has already been pushed into the remote

application data store and, if not, synchronizing the remote application data store with the local application data store

As with Claim 5, the Examiner contends that Brown paragraph 40 teaches the fourth element listed above. As with Claim 1, the Examiner contends that Brown paragraphs 79-83 teach the seventh element listed above. As made clear above with reference to Claims 1 and 5, The Examiner's contentions are mistaken. Brown fails to teach or suggest the fourth and seventh elements.

For at least these reasons, Claim 10 is felt to distinguish over Brown. Claims 11, 12, and 15 are thus also felt to distinguish over Brown based on their dependency from Claim 10.

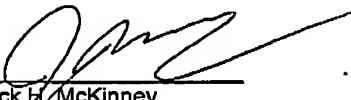
Claim 17 is directed to a computer readable medium having instructions for performing the method steps of Claim 1. For the same reasons Claim 1 distinguishes over Brown so does Claim 17. Claims 18-20 are thus also felt to distinguish over Brown based on their dependency from Claim 17.

Claim 21 is directed to a computer readable medium having instructions for performing the method steps of Claim 5. For the same reasons Claim 5 distinguishes over Brown so does Claim 21. Claims 22 and 23 are thus also felt to distinguish over Brown based on their dependency from Claim 21.

Claim 26 is directed to a computer readable medium having instructions for performing the method steps of Claim 10. For the same reasons Claim 10 distinguishes over Brown so does Claim 26. Claims 27, 28, and 31 are thus also felt to distinguish over Brown based on their dependency from Claim 26.

**Conclusion:** All pending claims are felt to be in condition for allowance. The foregoing is believed to be a complete response to the outstanding office action.

Respectfully submitted,  
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November 17, 2004